

REMARKS

In light of the following remarks, reconsideration and allowance of this application are respectfully requested.

A telephone interview between the Examiner and Mr. Dennis M. Smid (one of applicant's undersigned attorneys) was held on November 18, 2004. The applicant and Mr. Smid wish to thank the Examiner for her time and consideration for such interview.

Claims 1, 2 and 4-21 are in this application.

Claims 1, 2 and 4-21 are rejected under 35 U.S.C. §103(a) as being unpatentable over Fukuzumi (U.S. Patent No. 5,845,066) in view of Kawaguchi (U.S. Patent No. 5,557,771) and Estrakhri et al. (U.S. Patent No. 6,125,435).

As discussed during the November 18th telephone interview, independent claim 1 recites in part the following:

“a conversion table which includes logic addresses which are assigned only to blocks in said first storage region and are not assigned to (i) defective blocks and (ii) non-defective blocks in said second storage region.” (Emphasis ours)

In explaining the above 103 rejection with regard to claim 1, the Examiner acknowledged that Fukuzumi and Kawaguchi do not disclose the above feature of claim 1. In an attempt to cure such deficiency, the Examiner relied on Estrakhri. During the November 18th interview, the Examiner indicated that such feature of claim 1 is not disclosed in Estrakhri.

Accordingly, independent claim 1 is believed to be distinguishable over the applied combination of Fukuzumi, Kawaguchi and Estrakhri.

For reasons similar to those described above with regard to independent claim 1, independent claims 8 and 15 are also believed to be distinguishable from the applied combination of Fukuzumi, Kawaguchi and Estrakhri.

Claims 2, 4-7, 9-14, and 16-21 are dependent from one of independent claims 1, 8 and 15, and, due to such dependency, are also believed to be distinguishable from the applied combination of Fukuzumi, Kawaguchi and Estrakhri for at least the reasons previously described.

Applicant therefore respectfully requests the rejection of claims 1, 2 and 4-21 under 35 U.S.C. 103(a) be withdrawn.

In the event, that the Examiner disagrees with any of the foregoing comments concerning the disclosures in the cited prior art, it is requested that the Examiner indicate where, in the reference or references, there is the basis for a contrary view.

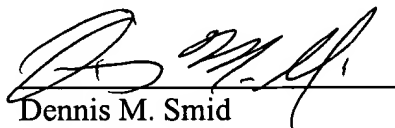
In view of the foregoing remarks, it is believed that all of the claims in this application are patentable over the prior art, and early and favorable consideration thereof is solicited.

Please charge any fees incurred by reason of this response and not paid herewith to Deposit Account No. 50-0320.

Respectfully submitted,

FROMMER LAWRENCE & HAUG LLP
Attorneys for Applicant

By:


Dennis M. Smid
Reg. No. 34,930
(212) 588-0800